

UNITED STATES BANKRUPTCY COURT  
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: :  
JOSEPH DAVID SHOCK :  
KATHY ANN SHOCK : CHAPTER 13  
Debtor :  
: :  
JACK N. ZAHAROPOULOS :  
STANDING CHAPTER 13 TRUSTEE : CASE NO. 5-25-bk-00466  
Movant :  
: :  
JOSEPH DAVID SHOCK :  
KATHY ANN SHOCK :  
Respondent : :

TRUSTEE'S AMENDED OBJECTION TO CHAPTER 13 PLAN

AND NOW, this 8<sup>th</sup> day of April 2025, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, and objects to the confirmation of the above-referenced Debtor(s)' Plan for the following reason(s):

1. Trustee avers that Debtor(s)' Plan cannot be administered due to the lack of the following:
  - a. Debtor(s) has not provided to Trustee pay stubs for the month(s) of August 2024.
2. Trustee provides notice to the Court as to the ineffectiveness of Debtor(s)' Chapter 13 Plan for the following reasons:
  - a. Clarification of vesting property (not selected). Because non-exempt equity exists, the Plan should provide for vesting at closing. Accordingly, the Plan violates §1325(a)(4).

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WHEREFORE, Trustee alleges and avers that Debtor(s)' Plan cannot be confirmed, and therefore Trustee prays that this Honorable Court will:

- b. Deny confirmation of Debtor(s)' Plan.
- c. Dismiss or convert Debtor(s)' case.
- d. Provide such other relief as is equitable and just.

Respectfully submitted:

Jack N. Zaharopoulos  
Standing Chapter 13 Trustee  
8125 Adams Drive, Suite A  
Hummelstown, PA 17036  
(717) 566-6097

BY: /s/ Douglas R. Roeder  
Attorney for Trustee

CERTIFICATE OF SERVICE

AND NOW, this 8<sup>th</sup> day of April 2025, I hereby certify that I have served the within Objection by electronically notifying all parties or by depositing a true and correct copy of the same in the United States Mail at Hummelstown, Pennsylvania, postage prepaid, first class mail, addressed to the following:

SABATINI LAW FIRM, LLC  
216 NORTH BLAKELY STREET  
DUNMORE, PA 18512-

/s/Tammy Life  
Office of Jack N. Zaharopoulos  
Standing Chapter 13 Trustee